

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

UNITED STATES OF AMERICA)	CR. NO. <u>2:21-cr-424</u>
)	
)	18 U.S.C. §2251(a)
)	18 U.S.C. §2251(e)
)	18 U.S.C. §2252A(a)(2)
)	18 U.S.C. §2252A(b)(1)
vs.)	18 U.S.C. §2252A(a)(5)(B)
)	18 U.S.C. §2252A(b)(2)
)	18 U.S.C. §2253(a)
)	18 U.S.C. §2422(b)
)	18 U.S.C. §2428
)	28 U.S.C. §2461(c)
)	
DAVID CURTIS WHITE)	<u>INDICTMENT</u>
)	(UNDER SEAL)

COUNT ONE

(Production of Child Pornography)

THE GRAND JURY CHARGES:

That from in or about August 2020 through in or about October 2020, in the District of South Carolina, and elsewhere, the defendant, **DAVID CURTIS WHITE**, did knowingly employ, use, persuade, induce, entice, and coerce a minor, namely M.F.V. #1, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, using materials that have been mailed, shipped, and transported in and affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT TWO

(Use of Interstate Commerce Facility to Entice Minor to Engage in Sexual Activity)

THE GRAND JURY FURTHER CHARGES:

That from in or about August 2020 through in or about October 2020, in the District of South Carolina, and elsewhere, the defendant, **DAVID CURTIS WHITE**, did use a facility of interstate and foreign commerce, to knowingly persuade, induce, entice and coerce any individual who had not attained the age of 18 years, namely M.F.V. #1, to engage in any sexual activity for which any person could be charged with a criminal offense.

In violation of Title 18, United States Code, Section 2422(b).

COUNT THREE
(Distribution of Child Pornography)

THE GRAND JURY FURTHER CHARGES:

That on or about October 29, 2020, in the District of South Carolina, and elsewhere, the defendant, **DAVID CURTIS WHITE**, knowingly did distribute child pornography and materials that contained child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Sections 2252A(a)(2) and 2252A(b)(1).

COUNT FOUR
(Distribution of Child Pornography)

THE GRAND JURY FURTHER CHARGES:

That on or about October 31, 2020, in the District of South Carolina, and elsewhere, the defendant, **DAVID CURTIS WHITE**, knowingly did distribute child pornography and materials that contained child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Sections 2252A(a)(2) and 2252A(b)(1).

COUNT FIVE

(Possession of Child Pornography involving a Prepubescent Minor)

THE GRAND JURY FURTHER CHARGES:

That on or about June 7, 2021, in the District of South Carolina, the defendant, **DAVID CURTIS WHITE**, did knowingly possess materials that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor, that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer, and that were produced using materials that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and 2252A(b)(2).

FORFEITURE

SEXUAL EXPLOITATION OF CHILDREN:

Upon conviction for violation of Title 18, United States Code, Sections 2251(a) and 2252A, as charged in this Indictment, the Defendant, **DAVID CURTIS WHITE**, shall forfeit to the United States his interest in:

- i. any visual depiction described in section 2251, 2251A, 2252 or 2252A of chapter 110 of the United States Code, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of chapter 110 of the United States Code;
- ii. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses and;
- iii. any property; real or personal, used or intended to be used to commit or to promote the commission of such offenses.

ENTICEMENT OF A MINOR TO ENGAGE IN SEXUAL ACTIVITY:

Upon conviction for violation of Title 18, United States Code, Section 2422, as charged in this Indictment, the Defendant, **DAVID CURTIS WHITE**, shall forfeit to the United States any property, real or personal, that was used or intended to be used, in any manner or part, to commit or to facilitate the commission of such offense, and any property, real or personal, which constitutes, is traceable, or is derived from any proceeds obtained, directly or indirectly, as a result of such offense.

PROPERTY:

The property subject to forfeiture pursuant to Title 18, United States Code, Sections 2253 and 2428, and Title 28, United States Code, Section 2461(c), includes, but is not limited to, the following:

A. Forfeiture Judgment:

A sum of money equal to all proceeds the Defendant obtained, directly or indirectly, from the offenses charged in this Indictment, and all interest and proceeds traceable thereto, and/or such sum that equals all property derived from or traceable to his violation of Title 18.

B. Electronic Equipment:

1. (1) Flash drive
Asset ID: 21-FBI-006585
2. Hewlett Packard Model 15-1233WN laptop
Serial Number: 5CD6382VJN
Asset ID: 21-FBI-006585
3. (1) Xbox
Serial Number: Unknown
Asset ID: 21-FBI-006585
4. Apple iPhone 11 Model MW17211/A
Serial Number: C6KZD0X9N72J
Asset ID: 21-FBI-006585

SUBSTITUTE ASSETS:

If any of the property described above, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by 18 U.S.C. § 982(b)(1) to seek forfeiture of any other property of Defendants up to an amount equivalent to the value of the above-described forfeitable property;

All pursuant to Title 18, United States Code, Sections 2253 and 2428, and Title 28, United States Code, Section 2461(c).

A True BILL



FOREPERSON

M. Rhett Dehart
M. RHETT DEHART (dhs)
ACTING UNITED STATES ATTORNEY